



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*26 Federal Plaza
New York, New York 10278*

May 27, 2024

VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Ryan Salame*
S7 22 Cr. 673 (LAK)

Dear Judge Kaplan:

The Government respectfully writes to request that the Court partially vacate and amend the Consent Preliminary Order of Forfeiture as to Substitute Assets/Money Judgment (the “Preliminary Order of Forfeiture”), which was entered against the above-referenced defendant on September 7, 2023 on two grounds.

First, since the entry of the Preliminary Order of Forfeiture, the Government has determined that the 2021 Porsche 911 Turbo S with VIN number WP0AD2A94MS257710 (the “Subject Asset”) does not have sufficient equity to further pursue forfeiture. With the consent of the defendant, the Government therefore respectfully requests that the Court partially vacate the Preliminary Order of Forfeiture with respect to the Subject Asset and amend the Preliminary Order of Forfeiture to require the Defendant to pay the costs of maintaining the Subject Asset, that is, \$1,480.74.

Second, as described in the Government's sentencing submission, the defendant has requested additional time to pay \$6 million to the Government, as required by the Preliminary Order of Forfeiture ¶ 3. The Government has consented to that request, and respectfully requests that the Court partially vacate the Preliminary Order of Forfeiture with respect to the date he must make payment of the \$6 million, and amend that date to September 3, 2024.

Respectfully submitted,

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